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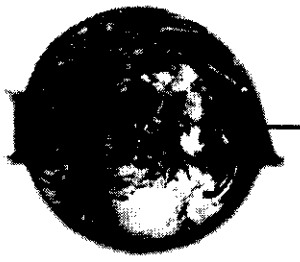

Digital Transmission
Licensing Administrator

July 22, 2004

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Re: In the Matter of Certification of Digital Output Protection Technology:
Digital Transmission Content Protection, Docket No. 04-64

Dear Ms. Dortch:

In response to an *ex parte* telephone conference held July 21, 2004, with Rick Chessen, William Johnson and Susan Mort of the Media Bureau, the Digital Transmission Licensing Administrator LLC ("DTLA") submits this clarification concerning the localization techniques employed for DTCP-IP, as described at page 2 of the letter from DTLA and the Motion Picture Association of America ("MPAA") dated July 20, 2004.

The described amendment to the DTLA Specification for DTCP-IP will include the following elements:

- Source devices shall expire their exchange keys within two hours after all content transmission has ceased. Exchange keys are necessary to decrypt content and are only provided to a Sink device after successful authentication and key exchange (AKE) and Round Trip Time (RTT) test.

- Per the Specification, source devices maintain a "registry" of device identifiers taken from the certificates of DTCP sink devices that have successfully completed the AKE process for DTCP.

- As part of the AKE process, DTCP-IP source devices must conduct and pass an RTT test if the sink device is not already on the registry. This RTT test is performed using a cryptographically protected method.

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- When RTT <= 7 milliseconds, the sink device "passes" the RTT test and its identifier is added to the registry of the source device. The source device will set its content quantity tracker to 40 hours. [Note: The "tracker" is maintained only within the source device, and tracks only the number of hours of content transmitted by that source device. The source device does not track what content is being transmitted, or report any information whatsoever back to DTLA. The purpose of the "tracker" is solely to enhance localization security by ensuring that sink devices are authenticated for reasonably limited periods, and are not indefinitely registered to receive protected content from the source device.]

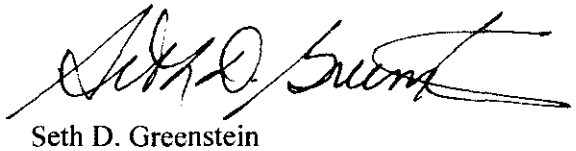
- Source devices will remove sink devices from the registry after 40 hours of content transmission so that a new AKE and RTT test will be performed the next time that sink device attempts to execute an AKE process with that source device. This process does not interrupt content transmission; the sink device identifier is merely removed from the registry.

- Speculative RTT testing is permitted and, when passed allows the sink device to be added to the RTT registry if it is not already registered or, if the sink device already is registered, the content quantity tracker is reset to 40 hours.

We hope this supplemental information clarifies the technical obligations that will be included, pursuant to the Work Plan, in the Specification for DTCP-IP. DTLA currently anticipates that the revised Specification will be distributed to Adopters within the next 30 days. Assuming there are no comments, questions or objections from licensees to these changes, DTLA expects that the final revised Specification will be distributed to licensees in September 2004, and will become effective 18 months thereafter.

In accordance with Section 1.1206 of the Commission rules, this original and one copy are being provided to your office, and a copy is being provided to the individuals named above.

Respectfully submitted,



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